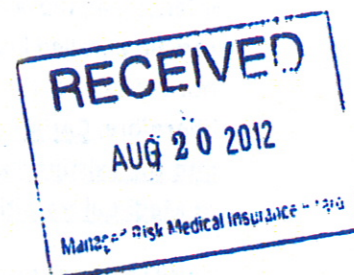




**CAHIO**

August 17, 2012

Toby Douglas, Director  
California Department of Health Care Services  
P.O. Box 997413, MS: 0000  
Sacramento, CA 95899-7413



Janette Casillas, Executive Director  
Managed Risk Medical Insurance Board  
1000 G Street, Suite 450  
Sacramento CA 95814

**RE: COHS plans and the transition of Healthy Families to Medi-Cal**

Dear Ms. Casillas and Mr. Douglas:

As Chair of the California Association of Health Insuring Organizations (CAHIO) representing the six (6) County Organized Health System (COHS) plans that serve over 75,000 Healthy Families Program (HFP) enrollees and over 1,000,000 Medi-Cal members, I am writing to offer recommendations regarding the impending transition of HFP enrollees to the Medi-Cal program.

CAHIO understands and appreciates the thoughtful planning and the work that is required in developing and implementing a plan to transition HFP enrollees into Medi-Cal beginning in 2013 and wishes to support MRMIB and DHCS in their combined efforts towards a smooth transition. CAHIO further understands that MRMIB is in the process of developing a transition plan and is considering an approach that includes sub-phases within the transition phases outlined in AB 1494 and provides related recommendations.

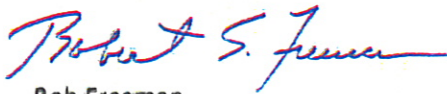
Since COHS plans are the sole Medi-Cal plans operating in their respective service areas, COHS plans HFP enrollees will transition to the COHS Medi-Cal plan in Phase I of the program transition, with the exception of Gold Coast Health Plan which is not a current HFP participating plan. CAHIO's primary goal is ensuring continuity of care and access to medically necessary services for enrolled children while also reducing member, provider and community confusion related to any phased-in process. To that end, if it is determined necessary to develop sub-phases within each transition phase, CAHIO recommends that those sub-phases be done on a county-wide or geographic basis so that all COHS HFP enrollees are transitioned to the respective COHS Medi-Cal plan at the same time. CAHIO believes that this provides for the smoothest and most efficient transition of members, thus reducing uncertainty and confusion

within a county. CAHIO further requests that COHS plan counties are included in the first sub-phase of any Phase I transition.

Additionally, two COHS plans are also participating plans in the Access for Infants and Mothers (AIM) program, and CAHIO wishes to offer a recommendation to MRMIB for handling the residual AIM-linked infants (i.e., those AIM-linked infants between 251-300% FPL) who CAHIO understands will initially remain enrolled in HFP. Because the numbers of these remaining AIM-linked infants are very small, it is not feasible for COHS AIM plans to continue to operate their HFP program for these few members. Therefore, CAHIO recommends that MRMIB enroll the AIM-linked infants remaining enrolled in the HFP into the existing statewide plan which will be providing HFP services through the final phase of the HFP to Medi-Cal transition.

CAHIO appreciates the opportunity to provide input into the development of this plan to transition our nearly 75,000 HF enrollees to our Medi-Cal plans and thanks MRMIB and DHCS for their consideration of these recommendations. Please feel free to contact me should you have any questions.

Sincerely,



Bob Freeman

Chair CAHIO

cc: Abbie Totten, California Association of Health Plans